

McCULLOCH | KLEINMAN

INTELLECTUAL PROPERTY ATTORNEYS

May 24, 2021

VIA ECF

Hon. John P. Cronan
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

**Re: *Spurlock, et al. v. Thomson Reuters America Corp., et al.* No. 1:20-cv-09135
(JPC)(BCM)**

Dear Judge Cronan,

This firm is counsel for Plaintiffs Brian Spurlock, Steven Mitchell, Adam Hunger, Thomas Russo, Greg Cooper, Stewart Milne, Noah Murray, Ian Rutherford, Steven Flynn, James E. Brown, and Mark Zerof ("Plaintiffs"). I write to request an extension of the deadline for Plaintiffs' Opposition to the Motion to Dismiss and in the Alternative for Summary Judgment, or to Stay Pending Arbitration (Docket No. 55) filed May 10, 2021 by Defendants' Adobe, Inc.; Sipa Press, Inc.; and Thomson Reuters America Corporation (collectively "Defendants"). Plaintiffs' opposition deadline currently is set for May 31, 2021.

Plaintiffs request that the Court extend the deadline to respond to Defendants' pending motion by four (4) days to June 4, 2021 to account for the Memorial Day holiday weekend.

This is the first request for an extension of this deadline and the requested extension does not conflict with any other deadlines in this matter. Plaintiffs have conferred with opposing counsel regarding the request and they have consented to the extension requested herein provided that Defendants' deadline to file their reply be extended from June 14, 2021 to June 22, 2021.

Respectfully submitted,



Nathaniel A. Kleinman, Esq.